

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

STATE OF ILLINOIS, and

STATE OF MINNESOTA,

Plaintiffs,

v.

GTCR, LLC,

GTCR BC HOLDINGS, LLC, and

SURMODICS, INC.,

Defendants.

Case No. 1:25-cv-02391

District Judge Jeffrey I. Cummings

**DEFENDANTS' UNOPPOSED MOTION TO SEAL THE CORRECTED
DECLARATION OF MARGUERITE SULLIVAN IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Paragraph 10 of the Confidentiality Order (Dkt. 61), Defendants GTCR, LLC, GTCR BC Holdings, LLC, and Surmodics, Inc. (collectively, “Defendants”) respectfully move the Court for an order, pursuant to Rules 5.2 and 7(b) of the Federal Rules of Civil Procedure and Local Rules 5.8 and 26.2, directing the Clerk of the Court to file under seal, until further order, the Corrected Declaration of Marguerite Sullivan in Support of Defendants’ Opposition to Plaintiffs’ Motion for Preliminary Injunction (“Corrected Declaration”). Defendants’ counsel conferred with counsel for Plaintiffs, and Plaintiffs agreed that they do not oppose this Motion.

Pursuant to the Court’s Confidentiality Order, “[i]n the event that any Confidential

Material is contained in any pleading, motion, exhibit or other paper filed or to be filed with the Court, the Court shall be so informed by the Party filing such papers, and such papers shall be filed *in camera*.” Dkt. No. 61, ¶ 10. The Corrected Declaration includes information designated as “Confidential Material,” including potentially sensitive business information provided by Defendants and third-parties.

In conjunction with this motion, Defendants provisionally file under seal an unredacted version of the Corrected Declaration. Pursuant to the Confidentiality Order, Dkt. 61, Defendants will publicly file a redacted version of the Corrected Declaration within five (5) business days of the filing of the Corrected Declaration. At the time of filing, Defendants will also serve an unredacted version of the Corrected Declaration.

WHEREFORE, Defendants respectfully request this Court grant them leave to file under seal the Corrected Declaration.

Date: August 12, 2025

Respectfully submitted,

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